

Alt

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RECEIVED

JUL 31 2008  
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MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

lcw

William Atkins

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

08CV4381  
JUDGE KENNELLY  
MAG. JUDGE COX

vs.

Case No: \_\_\_\_\_

(To be supplied)

Chief MORECI John Does

Lieutenant Tucker John Does

Sergeant MANOS John Does

ERT. EMERGENCE RESCUE TEAM John Does

Sergeant John Does

Sergeant John Does

(Enter above the full name of ALL  
defendants in this action. Do not

use "et al.") THOMAS J. DART SHERIFF SUPERVISORY. WHO CAN  
NAME THE UNKNOWN OFFICERS

CHECK ONE ONLY:

☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐ OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

**I. Plaintiff(s):**

- A. Name: William Atkins
- B. List all aliases: N/A
- C. Prisoner identification number: 2003-0014927
- D. Place of present confinement: COOK COUNTY Jail
- E. Address: 2600 S. CALIFORNIA AVENUE CHICAGO, IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Chief MORECI JOHN DOES  
 Title: Chief  
 Place of Employment: COOK COUNTY Jail
- B. Defendant: Lieutenant TUCKER JOHN DOES  
 Title: Lieutenant  
 Place of Employment: COOK COUNTY Jail
- C. Defendant: SERGEANT MANOS JOHN DOES  
 Title: Sergeant  
 Place of Employment: COOK COUNTY Jail

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

Defendant E.R.T. Unit John Does

Title EMERGENCE. RESCUE TEAM

Place of Employment COOK COUNTY Jail

Defendant SERGEANT JOHN DOES

Title SERGEANT

Place of Employment COOK COUNTY Jail

Defendant SERGEANT JOHN DOES

Title SERGEANT

Place of Employment COOK COUNTY Jail

Defendant SERGEANT JOHN DOES

Title SERGEANT

Place of Employment COOK COUNTY Jail

Defendant THOMAS J. DART

Title

SHERIFF SUPERVISORY

Place of Employment

COOK COUNTY Jail

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: OTC 2064  
OF BURGLARY Lesser included of  
Residential burglary
- B. Approximate date of filing lawsuit: 6/21/07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: 1  
William Atkins
- D. List all defendants: Officer Ken Walker  
Officer Linda Gutierrez  
Richard A Devine  
Terry Hillard
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. Cook County
- F. Name of judge to whom case was assigned: KENNELLY
- G. Basic claim made: WRONGLY CONVICTED
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still pending
- I. Approximate date of disposition: 10/26/04

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

## IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I am the plaintiff in this case I am A pre-trial Detainee who have being in A improper illegal degrading Strip Searches in 3 of these Divs. in Div-2 Tier H-1 2/20/2007 Some where doing that time At 2:30 A.M Sergeant John Does and other officers John Does Runs in on Tier H-1 during the time Plaintiff and other detainees was in Bed sleeping this was did every week taking us out of the cells into the day-room Strip us all and Search over or 24 of us, and at the same time searching our cells with our clothes all over the floor A mix of Detainees underwear, socks, tee shirts, using the same Gloves detainees side by side without curtains or blinds other detainees with bugs catch crabs Rashes and infections, Rashes the floors are infested it with Rodents, lost mites and mice. This is very unclean and unsanitary. They do the something going to Recreation Div-1-H-1 from

3-11 By Sergeant John Does & other officers  
 two time in one day. 3-11-7 with in 24 in the  
 hallway. Detainees are strip search the same  
 with with all above side by side no blinds or  
 curtains imperfect with rodents. the something  
 is did our in Div 9-2C I was moved to Div 9  
 because of the Grievance. that I never did  
 get Back, and the same Grievance I put in on  
 Div 9- and did not get any Back for the  
 Strip Search. same thing By Sergeant JOHN Does  
 and others. I was moved because of the Grievance  
 the plaintiff was move to Div-10-4-D. ~~at~~  
 when plaintiff got here with others he was  
 Strip Search by E.R. & did all the above  
 on March 1<sup>st</sup> 08 plaintiff and other detainees  
 was strip search going to 3:30 P.M.  
 Rec- time to the Gym when we got in the  
 Gym Room it was A Supervisory By  
 Sergeant Munroe JOHN Does and other C.O  
 JOHN Does it was A surprise Strip Search  
 Every Body get like you come in the room  
 Sergeant Munroe would say JOHN Does and  
 Every one would Strip down there that don't no

take off everything in the rec room it is 44-48 detainees side by side no blinds or curtains all have everything on the concrete floor where there is dust mites? mites Rodents very unsanitary underwear socks tee shirts all mix together using the same gloves to search each item. plaintiff is exposed to other detainees Colds, Bug,? Crabs Rashes? infections I end up with A Rash that wont go away it is degrading feet on the infested floor.

on May 31<sup>st</sup> 08 Plaintiff and other detainees on tier 4-D Div-10 was call to recreation at 7:30 A.M. it was a surprise strip search when we got down there Lieutenant Tucker who supervisory the who everything him and others. Co. John Doe's saying take off everything put it on the floor where there is dust mites and mices and all type of Rodents play is unsanitary, people working by looking in no blinds or curtains expose to every other detainees Germs, bugs, you can catch Crabs infections and Rashes, I end up with A Rash or something on my feet from the concrete floor, and the mix of different detainees clothes underwear socks tee-shirts also using the same gloves on every body. this is degrading illegal without A being justify NO Reason for this at all, it is also AN "BASE OF power. talking to you like you A Dog!"

10F- (5) OF ~~10~~ 10 William Atkins



And on 4,28,08 plaintiff & other detainees was strip searched on tier 4-D Div 10 by the E.R.T Unit John Does and others John Does who was taking several detainees from there cells at a time to the showers and strip searching them and there cells the detainees on the showers floor bar feet. Wet floors clothes on ~~the~~ the wet floor. Detainees side by side you can catch Heint's bug crabs Rashes infection or anything people may have. All above.

This is improper regarding spreading your Bullocks and Squatting and Coughing three times on the floor bar feet in the hallways bar feet in the Recreation yard last night and smelt all type of Rodents plus unsanitary therefore the buildings is unclean detainees side by side with nothing on can catch what they may have using the same Gloves to strip and searchers every one 48 detainees using no blinds or curtains, men and women walking reg looking in. I have a infection on a Rashes on my feet from this it look like it want go away. The Doctor name is Doctor Dunlap, who have been giving something for it to go away But it is still on my feet from the times of these strip searching, and they want send me anything back on my detainees grievance I put in to the Administration in all the Division But I never get anything back. 151 Mr. William Atkins



## V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

The plaintiff Requests Compensation  
For pain SUFFERING Humiliation Mental  
Anguish For the Rashes or infection ON  
Plaintiff Feet. Degrading IM Proper  
NO expectation WAS GIVEING plaintiff privacy  
is Violated. Plaintiff want this to stop if not put up  
Blinds OR CURTAINS, STOP Buttock SPREADING and Sguntting  
AND coughing

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

## CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 6 day of 26, 208

Wm William Atkins  
 (Signature of plaintiff or plaintiffs)

William Atkins  
 (Print name)

2003-0014927  
 (I.D. Number)

2600 S. CALIFORNIA AVENUE DIV-10-4-D  
P.O. BOX 089002  
Chicago Ill 60608  
 (Address)

## NORTHERN DISTRICT OF ILLINOIS

State of Illinois  
County of Cook

## Affidavit

I William Atkins being a First duly sworn on oath, do swear under penalty of perjury that the following statements are exact and true to the best of my knowledge.

- 1) I am the Plaintiff in this case and I have been violated of my constitution rights, as a pre-trial detainee detainees are being strip search at any time and every where I'm proper illegal degrading strip searches.
- 2) Plaintiff and other detainees in Div-1 Tier H-1. 2007, 2/20 some where doing that time at 2:30 A.M Sargeant John Does and other officers John Does ran in to tier H-1 doing the time Plaintiff and other detainees was in bed sleeping this was did very week taking us out of our cells in to the Day Room and then strip search 24 detainees side by side with the clothes on the floor no curtains or blinds mingling a mix of detainees clothes expose to germs, bugs, you can catch crabs, rashes, and infections. Rodents of all type.
- 3) The same thing is did there in Div-1 going and come back from court but it is did in the hallway every week day at 5:30 A.M by sargeant John Does & other officers John Does no blinds side by side hall infested it with rodents they have you spreading your buttocks and squatting and coughing all up above mixing under wear socks tee-shirts using same clothes to strip searches every one that is going to court that day 40-50 at one time been strip & search our A 100? and 50 or more at time, go to 1.50 that got court out of that Div-1.

- 2) IN DIV-1-H-1 PLAINIFF & ALL THE DETAINEES WOULD BE STRIP SEARCH 2 TIMES WITH IN THE SAME 24 HOUR AT 3-11 P:M GOIN TO THE REC ROOM BY "SGT JOHN DOES" & OTHERS "OFFICERS JOHN DOES" CONDUCTED A ILLEGAL STRIP SEARCH.
- 3) IN DIV-1-H-1 AT 11-TO-7:00 A:M WHEN THE "SGT JOHN DOES" & "OFFICERS JOHN DOES" RUN IN ON A TIER AT 2:00 SOMETHING A:M AND STRIP SEARCH & THE SAME THING WITH. GOING TO COURT AND AFTER COURT WITH IN THE SAME HOURS ILLEGAL DEGRADING SEARCH SO I WAS SAFETY, THE PLAINIFF PUT IN SEVERAL DETAINEE GRIEVANCE, AND THEY SAFETY ME TO DIV-9 FOR AND I NEVER GOT A GRIEVANCE BACK.
- 4) PLAINIFF WAS MOVE FOR PUTING IN TOO MANY GRIEVANCE IN DIV-9 IT WAS THE SAME THING STRIP SEARCH BY SGT JOHN DOES AND OFFICERS JOHN DOES ON 7-3 P:M. AND ON 3-11 P:M SGT JOHN DOES WITH OFFICERS JOHN DOES ALL DOING THE END OF 2007 I WAS ON 2-D AND MOVE OUT TO 2-C IN DIV-9, 4-21-07 ON 11-7 A:M DO. & SGT JOHN DOES RUN IN & STRIP SEARCH NOT LONG WITH IN HOURS I GO TO COURT AND YOU ARE STRIP SEARCH.
- 5) ALL THIS IS DID WITH OUT BLINDS & CURTAINS DETAINEES ARE SIDE BY SIDE WITH EVERY THING OFF EXPOSE TO PEOPLE GERMS, & BUGS, AND CRABS, RASHES & OTHER INFECTIONS YOUR CLOTHES ARE ON THE FLOOR MIX ALL TOGETHER THE FLOOR IS INFESTED IT WITH RODENTS AND GERMS FROM RATS DUST MITES AND MICE.
- 6) PLAINIFF WAS MOVE FROM DIV-9 BECAUSE OF GRIEVANCE AND WAS MOVE TO WITH OUT HEARING ANYTHING ON HIS GRIEVANCE. ON STRIP SEARCH AND THOMAS J. DART IS THE SUPERVISORY WHO CAN NAME AND IDENTIFY UNKNOWN COOK COUNTY JAIL OFFICERS.
- 7) I AM NOW IN DIV-10-H-0 PLAINIFF AND OTHER DETAINEES WAS STRIP SEARCH MARCH 1<sup>ST</sup> 08 GYM ROOM REC TIME AT 3:30 P:M ILLEGALLY SUPERVISORY BY SERGEANT MANOS WITH OTHERS OFFICERS WHEN PLAINIFF GOT TO THE REC ROOM IT WAS A SURPRISE

Strip Search ON the Foot were there is dust mites, AND  
 MICE ALL TYPE OF Rodents VERY UNSANITARY the  
 RECREATION AREA IS UNCLEAN DEGRADING AND ILLEGAL  
 NO Blinds or curtains expose to EVERYONE AND EVERYTHING  
 Detainees are side by side doing this strip search.  
 Clothes underwear socks tee shirts. Using the same gloves  
 to search each item EXPOSE to other people looking in to  
 people Detainees Geims, BUGS, & you can catch crabs  
 catch rashes. that I have catch on my feet, & other infections  
 Detainees MAY have.

11) ON MAY 31<sup>st</sup> 08 Plaintiff AND other Detainees on tier  
 U-D Div-10 WAS call to REC ROOM AT 7:30 A.M. & it WAS  
 A surprise strip search when we got there, it WAS  
 Lieutenant Tucker who SUPERVISOR y the other officers  
 John Does MARS, Smith John Does Pape John Does Wilson  
 John Does, Pickett, John Does Peomantie John Does they did  
 the same as above.

12) there WAS NO Blinds or curtains strip search on the Foot  
 the same tool were is dust mites & mice Rodents VERY  
 UNSANITARY in the RECREATION ARE is UNCLEAN DEGRADING  
 ILLEGAL EXPOSE to EVERYONE AND EVERYTHING Striping  
 Detainees side by side Clothes underwear socks tee shirts  
 all mix together using the same gloves to search each item expose  
 looking in Detainees Geims, BUG, & crabs, Rashes, & infections  
 that the other Detainees may have.

13) ON 4, 28, 08 Plaintiff & other Detainees WAS strip search  
 ON tier U-D Div-10 BY the E.R.T UNIT JOHN Does who  
 taking several Detainees from there cell at a time to  
 the wet showers AND strip search them side by side  
 taking everything off AND put it down on the showers  
 Foot on the tier that is infested it with Rodents crabs  
 Geims Bugs can catch Rashes and other infections  
 with the mix of clothes underwear socks tee-shirts using same  
 gloves to search each item. Also before AND After Court  
 the same thing in all above. VERY UNSANITARY VERY HAZARDOUS  
 TO our Health system.

12) plaintiff states that every time detainees are strip search they also search their cells, the only time they don't search is at count time. But still there is no blinds or curtains, every thing in your cell are mix together with the other detainee that is in the cell with you. papers and food come up missing.

13) this is against unreasonable searches and seizures. Violated the Fourth Amendment. there was no probable cause for any of this

14) plaintiff also states. that due process clause's protection of liberty includes, certain privacy related interests, this personal have violated the Federal constitution to the privacy rights.

15) this is being done with no reasonable expectation for strip search of one's privacy. & living quarters being searched unjustified, there have not been no contraband this is cruel and unusual punishment in violation of the Eighth Amendment

16) these strip searches are not related to legitimate security needs. & designed to harass may be and is found unconstitutional under the Fourth Amendment and the Eighth Amendment we do not have contact visits at all but, just the looking at opposite sex. Because of no curtains or blinds with the spreading,

19)

OF your Buttocks AND Squatting and making you  
coughing three times this is cruel and unusual  
punishment

20)

Sheriff Thomas J. Dart is the Supercorrupt who  
knows the unknown officers.

15/ Mr. William Atkins

Signed before me on this 6 day of 26 2008

Notary Seal  
15/ Mr. William Atkins

Notarized under and by T35 I L C S

5/1-109. under penalty of perjury

Notarized under and by 735 ILCS  
5/1-109, under penalty of perjury,  
this 6 day of Aug, 08.

\_\_\_\_\_  
Defendant

*Mr. William Atkins*  
Signature